REMARKS

Claims 1-5, 7-9, 11-14 and 16-21 are pending in this application. By this Amendment, claims 4, 8, 11-14 and 16-17 are amended, claims 19-21 are added and claims 6, 10 and 15 are cancelled without prejudice to or disclaimer of the subject matter contained therein. Applicants submit that the amendments to claim 4, 8 and 14 merely incorporate the features recited in cancelled claims 6, 10 and 14, respectively, and thus, do not raise new issues. No new matter is added. Reconsideration in view of the application is respectfully requested.

Further to the numerous telephone conversations with Examiner Thompson, Applicants respectfully request that a personal interview be granted in the event that the above amendments and the following remarks do not place the application in condition for allowance.

Claims 1, 8 and 14 are rejected under 35 U.S.C. §103(a) over the combination of U.S. Patent No. 5,729,632 issued to Tai and U.S. Patent No. 5,745,249 issued to Crean et al. (hereinafter "Crean"). The rejection is respectfully traversed for at least the following reasons.

With regard to claim 1, page 3 of the Office Action states that col. 9, lines 7-13 of Tai discloses a digital logic circuit that receives the halftone image data, and based on the selection indicator, passes the halftone image data without changes. However, the cited portion of Tai discloses that depending on the contrast index CI, screens may or may not be blended and does not disclose receiving halftone image data and, based on the selection indicator, passing the halftone image data without changes, as recited in claim 1. Further, page 4 of the Office Action states that col. 6, lines 37-41 and col. 7, lines 50-54 of Crean disclose a digital logic circuit that, based on the selection indicator, selects at least a portion of the halftone image data and replicates the selected portion of the halftone image data to produce replicated halftone image data. The cited portions of Crean, however, fail to disclose these features of

claim 1. In particular, col. 6, lines 37-41 of Crean discloses that the pre-computed brick parameters are fed to the dot address sequencer 44 and col. 7, lines 50-54 of Crean discloses the shift for the repetition of the Holladay brick. Thus, the cited portions of Tai and Crean do not disclose a digital logic circuit which, based on the selection indicator, passes the halftone image data without change or selects at least a portion of the halftone image data and replicates the selected portions of the halftone image data to produce replicated halftone image data, as recited in claim 1.

With regard to claim 8, Applicants submit that neither Tai nor Crean discloses a method including, *inter alia*, selecting one of a plurality of types of Holladay counters, the plurality of types of Holladay counters including at least one clustered dot counter and at least one stochastic counter, outputting address bits from the selected Holladay counter, outputting halftone image data from a look-up table based on at least the address bits from the selected Holladay counter and the continuous tone image data, wherein the look-up table includes at least one clustered-dot halftone screen and at least one stochastic halftone screen, and controllably processing the halftone image data based on the type of the selected Holladay counter, as recited in amended claim 8.

With regard to claim 14, Applicants submit that the combination of Tai and Crean fails to disclose a method including, *inter alia*, outputting a set of threshold values from a look-up table based on at least the selected address bits, wherein the look-up table includes at least one clustered-dot halftone screen and at least one stochastic halftone screen, and comparing each threshold value of the set from the look-up table to the continuous tone image data to produce halftone image data, as recited in amended claim 14.

Applicants submit that claims 8 and 14 were amended to recite the features of cancelled claims 10 and 15, and thus the amendments do not raise new issues. Further,

page 13 of the Office Action states that U.S. Patent No. 5,859,955 issued to Wang discloses a clustered-dot halftone screen and a stochastic halftone screen. The cited portions of Wang, however, only discloses a stochastically clustered dot or "stoclustic" screen (col. 9, lines 22-65). Wang clearly defines stochastically clustered pixel screens as screens which are clustered about arbitrarily or otherwise specified centers (col. 9, lines 54-60). Thus, Wang fails to disclose or suggest both a clustered-dot halftone screen and a stochastic halftone screen, and accordingly, Wang also fails to disclose or suggest a look-up table includes at least one clustered-dot halftone screen and a stochastic halftone screen, as recited in amended claims 8 and 14.

For at least these reasons, Applicants submit that the combination of Tai and Crean fail to disclose or suggest all the features of claims 1, 8 and 14 and further, with regard to claims 8 and 14, the combination of Tai, Crean and Wang fails to disclose all the features of claims 8 and 14. It is respectfully requested that the rejection be withdrawn.

Claims 2, 4-6, 10-13 and 15-17 are rejected under 35 U.S.C. §103(a) over Tai, in view of Crean and U.S. Patent No. 5,859,955 issued to Wang. The rejection of claims 6, 10 and 15 has been rendered moot by the cancellation of claims 6, 10 and 15. The rejection of the pending claims is respectfully traversed for at least the following reasons.

With regard to claims 2, 11-13 and 16-17, which depend form claims 1, 8 and 14, respectively, Applicants submit that Wang fails to overcome the deficiencies of the combination of Tai and Crean, as discussed above with regard to claims 1, 8 and 14. For at least these reasons, Applicants submit that the combination of Tai, Crean and Wang fails to suggest all the features of claims 2, 11-13 and 16-17.

With regard to claim 4 and claim 5, which depends from claim 4, Applicants submit that the combination of Tai, Crean and Wang fails to disclose a digital halftoning system

including, *inter alia*, a look-up table having a plurality of halftone screens, wherein the look-up table outputs a set of threshold values based on a state of the selected Holladay counter and the look-up table includes at least one clustered-dot halftone screen and at least one stochastic halftone screen, as recited in amended claim 4. As discussed above with regard to claims 8 and 14, Applicants submit that the Wang, which was cited in the Office Action for disclosing these features of cancelled claim 6, fails to disclose or suggest a look up table which has at least one clustered-dot halftone screen and at least one stochastic halftone screen.

For at least these reasons, Applicants submit that the combination of Tai, Crean and Wang fails to disclose or suggest all the features of claims 2, 4, 5, 11-13 and 16-17. It is respectfully requested that the rejection be withdrawn.

Claims 3, 9 and 18 are rejected under 35 U.S.C. §103(a) over the combination of Tai, Crean and U.S. Patent No. 5,410,414 issued to Curry. The rejection is respectfully traversed for at least the following reasons.

Applicants submit that Curry fails to overcome the deficiencies of the combination of Tai and Crean, as discussed above with regard to claims 1, 8 and 14, from which claims 3, 9 and 18 depend, respectively. For at least these reasons, Applicants submit that the combination of Tai, Crean and Curry fails to suggest all the features of claims 3, 9 and 18. It is respectfully requested that the rejection be withdrawn.

Claim 7 is rejected under 35 U.S.C. §103(a) over Tai in view of Crean, Wang and Curry. The rejection is respectfully traversed for at least the following reasons.

Applicants submit that Curry fails to overcome the deficiencies of Tai, Crean and Wang, as discussed above with regard to claim 4, from which claim 7 depends. For at least these reasons, Applicants submit that the combination of Tai, Crean, Wang and Curry fails to suggest all the features of claim 7. It is respectfully requested that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of all pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

Maryam M Ipakchi

James A. Oliff
Registration No. 27,075

Maryam M. Ipakchi
Registration No. 51,835

JAO:MMI/ccs

Date: July 15, 2004

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE AUTHORIZATION
Please grant any extension necessary for entry;
Charge any fee due to our Deposit Account No. 24-0037